

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

Zafar Sheikh,)	Case No.: 24-cv-658
)	
Plaintiff,)	Hon. Judge Martha Pacold
)	
v.)	
)	
Bashir Chaudry, et al.,)	
)	
Defendants.)	

OBJECTION TO THE ENTRY OF DEFAULT

NOW COME Defendants, Ali Chaudry, Rabia Chaudry, Amjad Chaudry, Syed Jahantab, BCA Investments Inc., Shamaila Rafiq, South Chicago One, Inc., and Quadir’s LLC (collectively “Defendants”), by and through their attorneys, Dan Garbis and The Garbis Law Firm, LLC, and respectfully object to the entry of any default against Defendants and in favor of Plaintiff, Zafar Sheikh (“Plaintiff”). In support of their Objection, Defendants state:

INTRODUCTION

1. On January 25, 2024, Plaintiff filed a complaint against Defendants seeking damages pursuant to various alleged fraudulent transfers.
2. The Plaintiff’s original complaint was dismissed by the Court on November 22, 2024 due to Plaintiff’s failure to state with particularity the circumstances constituting any fraud or fraudulent transfers.
3. The Court provided Plaintiff leave to file an amended complaint by December 19, 2024.
4. Rather than file an amended complaint, Plaintiff filed a motion to reconsider which was subsequently denied by the Court on December 18, 2024.
5. The Court provided Plaintiff an extension to file an amended complaint by January 10, 2025.

6. Other defendants in this matter, namely, Yakub Chaus, Nusrat Choudhry, Janaid Ahmad, and Congress & Pulaski Real Estate LLC filed motions to dismiss Plaintiff's amended complaint based on the fact that the amended complaint did not correct the pleading issues that the Court previously found were deficient, namely that Plaintiff's complaint lacked the requisite factual specificity that is required to plead fraud.

7. Defendants seek now to adopt the already pending motions to dismiss that have been filed by the other defendants in this matter, namely, Yakub Chaus, Nusrat Choudhry, Janaid Ahmad, and Congress & Pulaski Real Estate LLC.

WHEREFORE, Defendants, Ali Chaudry, Rabia Chaudry, Amjad Chaudry, Syed Jahantab, BCA Investments Inc., Shamaila Rafiq, South Chicago One, Inc., and Quadir's LLC, object to the entry of any default and seek to adopt the current motions to dismiss pending before this Court, and such additional relief this Court deems just.

Respectfully Submitted,
Ali Chaudry, Rabia Chaudry, Amjad Chaudry, Syed
Jahantab, BCA Investments Inc., Shamaila Rafiq,
South Chicago One, Inc., and Quadir's LLC

By: /s/ Dan E. Garbis
Attorney for Defendants

Dan E. Garbis
The Garbis Law Firm, LLC
7330 North Cicero Avenue
Lincolnwood, Illinois 60712
(847) 982-9518
ARDC No. 6257303
dgarbis@garbislawfirm.com